GEOFFREY S. BERMAN United States Attorney for the Southern District of New York By: LARA K. ESHKENAZI Assistant United States Attorney 86 Chambers Street, 3rd Floor New York, New York 10007 T: (212) 637-2758

F: (212) 637-2730

E-mail: lara.eshkenazi@usdoj.gov

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHAWN S. LEHAL,

No. 13 Civ. 3923 (RJS)

Plaintiff,

- against -

UNITED STATES MARSHAL SERVICE, et al.,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the memorandum of law dated April 6, 2018, accompanying declaration, and exhibits thereto, defendants Robert Martin, Eric King and James Masterson, by their attorney Geoffrey S. Berman, United States Attorney for the Southern District of New York, hereby move this Court, before the Honorable Debra Freeman, United States Magistrate Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, for judgment on the pleadings and dismissal of the Third Amended Complaint pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, and for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

Dated: New York, New York April 6, 2018

> GEOFFREY S. BERMAN United States Attorney for the Southern District of New York Attorney for Bivens Defendants

E-mail: lara.eshkenazi@usdoj.gov

By: /s/ Lara K. Eshkenazi LARA K. ESHKENAZI Assistant United States Attorney 86 Chambers Street New York, New York 10007 T: (212) 637-2758 F: (212) 637-2730

To: Fiona Kaye and Iya Megre
WilmerHale
7 World Trade Center

250 Greenwich Street New York, NY 10007 USA Attorneys for Plaintiff

Lalit K. Loomba and Allison Holubis
Wilson Elser Moskowitz Edelman & Dicker LLP
1133 Westchester Avenue
White Plains, NY 10604
Attorneys for defendants Central Falls Detention Facility Corp. and Edward Blanchette,